

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

) Chapter 11

) Case No. 22-11068 (JTD)

) (Jointly Administered)

**SECOND SUPPLEMENTAL DECLARATION OF MATTHEW B. LUNN IN SUPPORT
OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
TO RETAIN AND EMPLOY YOUNG CONAWAY STARGATT & TAYLOR, LLP
AS CO-COUNSEL, EFFECTIVE AS OF DECEMBER 22, 2022**

I, Matthew B. Lunn, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury
that:

1. I am a partner in the firm of Young Conaway Stargatt & Taylor, LLP (“Young Conaway” or the “Firm”), with offices at Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, and am duly admitted to practice in the States of Delaware and New York and the District of Columbia, as well as the United States District Court for the District of Delaware, the United States District Court for the Southern District of New York, and the United States Court of Appeals for the Second and Third Circuits.

2. I submit this second supplemental declaration (this “Second Supplemental Declaration”) in support of the *Application of the Official Committee of Unsecured Creditors to*

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

Retain and Employ Young Conaway Stargatt & Taylor, LLP as Co-Counsel, Effective as of December 22, 2022 (the “Application”) [Docket No. 522].²

3. Young Conaway has continued to monitor any potential conflicts or connections that may arise with respect to its representation of the Official Committee of Unsecured Creditors in these chapter 11 cases.

4. This Second Supplemental Declaration discloses Young Conaway’s representations of (i) Bittrex Incorporated and its affiliated debtors and debtors-in-possession in their chapter cases that are being jointly administered under the caption *In re Desolation Holdings LLC*, Case No. 23-10597 (BLS) and (ii) Rocket Companies, Inc. These representations are unrelated to these chapter 11 cases.

5. Young Conaway remains disinterested within the meaning of section 101(14) of the Bankruptcy Code in that it does not hold or represent an interest adverse to the Debtors or their estates. Young Conaway will continue to supplement its disclosures with respect to interested parties as warranted.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Dated: May 19, 2023
Wilmington, Delaware

/s/ Matthew B. Lunn
Matthew B. Lunn

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Application.